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2 UNITED STATES DISTRICT COURT
3 FOR THE CENTRAL DISTRICT OF CALIFORNIA
4 EASTERN DIVISION
5

6 STEPHENSON AWAH TENENG, *et*
7 *al.*,

8 Plaintiffs,

9 v.

10 DONALD J. TRUMP, *et al.*,

11 Defendants.

No. CV 18-1609-JGB-KK

DECLARATION OF SUPERVISORY
DETENTION AND DEPORTATION
OFFICER IAN HERRERA

12 I, Ian Herrera, do hereby declare and state as follows:
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14 1. I am the Acting U.S. Immigration and Customs Enforcement (ICE)
15 Enforcement and Removal Operations (ERO) Assistant Field Office Director (AFOD) in
16 the Los Angeles Field Office. The Los Angeles ERO Field Office was responsible for
17 placing immigration detainees at the Bureau of Prison's Federal Correctional Institution
18 (FCI) in Victorville, California (FCI Victorville).

19 2. I have read the allegations in the Complaint in this lawsuit. I make the
20 following factual statements based on my personal knowledge and my review of the
21 official records of ICE ERO, and, if called as a witness, I could and would testify
22 competently thereto.

23 3. Upon information and belief, beginning on June 8, 2018, until September 14,
24 2018, the Federal Bureau of Prisons (BOP) temporarily housed approximately 1,400
25 detainees for ICE. Currently, there are no ICE detainees at FCI Victorville.

26 4. Beginning in June 2018, Los Angeles ERO moved the immigration detainees
27 from FCI Victorville to the Adelanto ICE Processing Center (APC) at a rate of
28 approximately 150 detainees per week. Detainees were brought to APC for court

1 proceedings, for an interview with an asylum pre-screening officer (APSO), or for other
2 purposes and then remained at APC and were not returned to FCI Victorville.

3 5. Los Angeles ERO use of FCI Victorville to house immigration detainees was
4 temporary. Los Angeles ERO does not intend to use FCI Victorville in the future to house
5 immigration detainees.

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7 I declare under penalty of perjury that the foregoing is true and correct.

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9 Executed on September 17, 2018, at Adelanto, California.

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12 Ian Herrera
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